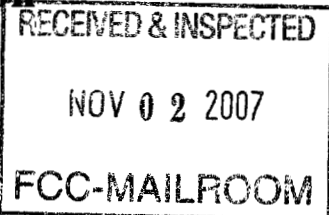


LOWER
KUSKOKWIM
SCHOOL
DISTRICT

Technology Assisted Instruction

P.O. Box 305 Bethel, Alaska 99559-0305
Phone 907-543-4876 Fax 907-543-4911



Marlene H. Dortch, Secretary
Federal Communications Committee
Office of Secretary
445 12th Street, SW
Washington, DC 20554

CC: 02-6

Dear Ms Dortch,

This letter is appealing a decision by Universal Service Administration Company to fund only 58% of a Lower Kuskokwim School District phone bill instead of the designated 81%.

The reason for appealing direct to the FCC is that, in the circumstances, I do not think I would have any success with USAC because a form 471 was submitted which would have covered the full amount of the bill but it was rejected by USAC in favor of a lesser amount.

The Details are as follows:

Funding Commitment year 2006-2007

Form 471 #	504372
FRN #	1397399

Initial pre-discount amount applied for attachment A)	\$4,082.11 month (see
Amount ultimately accepted by USAC attachment B)	\$1,219.33 month (see

No. of Copies rec'd 041
List A B C D E

October 23, 2007

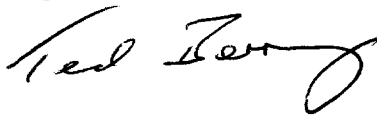
Full amount of the bill	\$21,077.65	(see attachment B)
Discount applied for	\$16,862.12	
Discount rate	81%	
Actual discount rate paid	58%	
Discount paid	\$11,851.89	(see attachment C)

Reason for rejection by USAC was that a phone bill, which was one whole bill the previous year, was split in two because of differing discount rates. Since there was no real way to calculate the amount to be allocated to each of the new separate bills, the total of the previous year's bill was used on each of new separated form 471s (see attachments A and D). I was told I could not use the same amount for each bill even though the end result would be the same (that is, based on the actual bill). This split had not been done before and so there was no precedent to provide an idea of what the pre-discount amount should be. I was told by USAC that the two FRNs had to add up to the total for the previous year. As could be expected in such circumstances, my estimate was up on one of the separated bills and down on the other.

The purpose of this letter is to apply for the surplus on FRN 1385813 (\$6,634.16 see attachment E) to be applied to the shortfall FRN 1397399 (\$5,220.11) since they were both on the same FRN the previous year.

The grounds for this appeal are that I originally submitted an amount that would have covered the full phone bill but was told to change the amount of the application by USAC. As I said, this was a new procedure and I had no way of knowing how much the final pre-discount amount would be on either of the new bills.

Thank you for your consideration.


Ted Berry
Technology Coordinator

10/27/07

ATTACHMENT "A"

FUNDING COMMITMENT REPORT

Billed Entity Name: LOWER KUSKOKWIM SCHOOL DIST

BEN: 145563

Funding Year: 2006

Form 471 Application Number: 504372

Funding Request Number: 1385835

Funding Status: Funded

Category of Service: Telecommunications Service

Form 470 Application Number: 721790000560115

SPIN: 143000594

Service Provider Name: Unicom, Inc.

Contract Number: MTM

Billing Account Number: 9075434800

Service Start Date: 07/01/2006

Contract Expiration Date: 06/30/2007

Number of Months Recurring Service Provided in Funding Year: 12

Annual Pre-discount Amount for Eligible Recurring Charges: \$11,367.60

Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00

Pre-discount Amount: \$11,367.60

Discount Percentage Approved by the USAC: 66%

Funding Commitment Decision: \$7,502.62 - FRN approved; modified by SLD

Funding Commitment Decision Explanation: The FRN was modified from \$3473.44 to \$947.30 at the request of the applicant. The shared discount was reduced to a level that could be validated by third party data.

FCDL Date: 02/06/2007

Wave Number: 042

Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2006

Funding Request Number: 1397399

Funding Status: Funded

Category of Service: Telecommunications Service

Form 470 Application Number: 721790000560115

SPIN: 143022020

Service Provider Name: United KUC, Inc.

Contract Number: T

Billing Account Number: 9075434800

Service Start Date: 07/01/2006

Contract Expiration Date: 06/30/2007

Site Identifier: 16025710

Number of Months Recurring Service Provided in Funding Year: 12

Annual Pre-discount Amount for Eligible Recurring Charges: \$14,631.96

Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00

Pre-discount Amount: \$14,631.96

Discount Percentage Approved by the USAC: 81%

Funding Commitment Decision: \$11,851.89 - FRN approved; modified by SLD

Funding Commitment Decision Explanation: The FRN was modified from \$4,082.11 to \$1,219.33 at the request of the applicant.

FCDL Date: 02/06/2007

Wave Number: 042

Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2006

ATTACHMENT "B"

Need Help?

BEAR Home



New BEAR Form



Track Form



Bulk Download



Terms and Conditions



Logout

View BEAR Invoice

PRINTABLE PAGE

The following invoice has been successfully submitted for certification:

Invoice ID: 810296

Created on 9/18/2007 8:24 PM

Last updated on 9/18/2007 8:26 PM

Block 1: Header Information

Need Help?

1. 471 Billed Entity Name
LOWER KUSKOKWIM
SCHOOL DIST2. 471 Billed Entity Number
1455633. Service Provider
Identification Number (SPIN)
1430220204. Contact Name TED BERRY
5. Contact Telephone Phone (907) 543-4876
Contact Fax (907) 543-4911
Contact Email ted_berry@lksd.org6. Reimbursement Form Number
Bet local 60-077. Reimbursement Date to USAC
9/18/20078. Total Reimbursement Amount
(total of block 2, item 15 - 14.2 digits maximum)
\$ 16862.12Block 2: Line Item Information Per Funding Request Number

Need Help?

9. FCC Form 471 Application Number (10 digits) (from Funding Commitment Decision Letter)	10. Funding Request Number (FRN) (10 digits) (from Funding Commitment Decision Letter)	12. Customer Billed Date	13. Shipping date to Customer or Last Day of Work Performed	14. Total (Undiscounted) Amount for Service (14.2 digits max.)	15. Discount Amount Billed to USAC (14.2 digits max.)	Discount From FRN	Approval Status
1) 504372	1397399	7/1/2006					AWAITING SP CERTIFICATION

Block 3: Billed Entity Certification

Need Help?

Contact Information for Billed Entity Authorized Person:

By logging into your account using your PIN, checking this box, and clicking the "certify" button at the end of the form, you

have electronically signed the form. You are reminded that an electronic signature is the same as a handwritten signature on the form.

To see a copy of the Terms and Conditions to which you previously agreed, please click on the "Terms and Conditions" menu above.

Submission Date 9/18/2007

18. Name TED BERRY
19. Title/Position TECHNOLOGY COORDINATOR
20a. Address 1 PO BOX 305
Address 2
City BETHEL
State AK
Zip Code 99559 - 0305

20b. Phone Number (907) 543-4876
20c. Fax Number (907) 543-4911
20d. Email TED_BERRY@LKSD.ORG
21. Name of Authorized Person's Employer Lower Kuskokwim School District

Additional Comments:

OMB Number 3060 - 0856 Form 472

[SLD Home](#) | [Contact Us](#)

Client Service Bureau: 1-888-203-8100

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ATTACHMENT "C"

Schools and Libraries Division

Form 472 (BEAR Form) Notification Letter

September 28, 2007

United KUC, Inc,
Angela Gaylor
5450 A Street
Anchorage, AK 99518-1291

Re: Form 472 Invoice Number: 810296
Service Provider Identification Number: 143022020
Applicant Form 472 Identifier: Bet local 60-07
Billed Entity Number: 145563

LOWER KUSKOKWIM SCHOOL DIST
TED BERRY
P.O. BOX 305
BETHEL, AK 99559

Preferred Mode of Contact: Phone at (907) 543-4876
Total Amount of Reimbursement Approved for Payment: \$11851.89

This letter is to notify you that the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has received and accepted a Form 472 from the above named applicant listing you as the service provider. The SLD has committed to reimburse the discounted portion of the cost of eligible services provided to eligible entities pursuant to one or more Forms 471. As stated in the Form 486 Notification Letter sent to you previously, the applicant has filed a Form 486 advising the SLD that service delivery has begun. The applicant has completed this Form 472 with your assistance, seeking reimbursement of the discounted portion of bills already paid in full to you since the effective date of the discount.

The SLD has processed the Form 472. Pursuant to the Service Provider Acknowledgment page of the Form 472 which you signed, you must remit to the applicant the amount shown as "Total Amount of Reimbursement Approved for Payment" above, no later than 10 calendar days after receipt of payment of the approved discounts from USAC. You also agreed not to tender or make use of the payment of the approved discounts issued by USAC to you prior to remitting the discount to the applicant.

The USAC check should be mailed to the service provider named above within 20 calendar days of the date of this letter.

To reimburse the "Total Amount of Reimbursement Approved for Payment," to the applicant, the service provider may (1) issue a check or (2) issue a credit to the applicant. The decision as to which form the reimbursement should take should be a mutual one between the service provider and the applicant.

The maximum remaining amount available for each Funding Request Number (FRN) listed on the synopsis on the following page(s) will be the original commitment less the amount approved herein for reimbursement and less any earlier disbursements to the applicant.

PLEASE NOTE: Beginning with Funding Year 2000 (07/01/2000 - 06/30/2001), if the first payment request processed for an FRN is on a Form 472, all subsequent payment requests for that FRN must be made on a Form 472; a Form 474 (Service Provider Invoice Form) for that FRN will not be accepted.

EXPLANATION OF INFORMATION PROVIDED IN THIS FORM 472 (BEAR FORM) NOTIFICATION LETTER

To help understand the Form 472 Notification Letter Applicant Reimbursement Synopsis the following definitions are provided.

Funding Request Number (FRN): A Funding Request Number is assigned by the SLD to each Block 5 of a Form 471 once an application has been processed. This number is used to report to applicants and service providers the status of individual discount funding requests submitted on a Form 471.

471 Application Number: A unique identifier assigned to a Form 471 by the SLD, from page 1 of the Form 471.

Funding Year: The funding year for which discounts have been approved. Funding years begin on July 1 and end on the following June 30. Funding years are designated by the calendar year in which they begin.

Contract Number: The contract or agreement number as identified in Block 5, Item 15 of the Form 471.

Funding Commitment Decision: This represents the TOTAL amount of funding that the SLD has reserved to reimburse the cost of the discounts for this service for the specified funding year.

Reimbursement Amount for this FRN: This is the amount of reimbursement to the applicant that has been approved for this FRN on this Form 472.

Reimbursement Request Decision Explanation (SHOWN ONLY IF RELEVANT): This is the reason(s) that a Reimbursement Request was reduced or rejected.

Schools and Libraries Division
Universal Service Administrative Company
CC: LOWER KUSKOKWIM SCHOOL DIST

FORM 472 NOTIFICATION LETTER APPLICANT REIMBURSEMENT SYNOPSIS

Funding Request Number: 1397399
471 Application Number: 504372
Funding Year : 07/01/2006 - 06/30/2007
Contract Number: T
Funding Commitment Decision: \$11851.89
Reimbursement Amount for this FRN: \$11851.89
Reimbursement Request Decision Explanation:
Partial Paymnt, Inv > Remaining Commitment;

ATTACHMENT "D"

FUNDING COMMITMENT REPORT Billed Entity Name: LOWER KUSKOKWIM SCHOOL DIST BEN: 145563 Funding Year: 2006

Form 471 Application Number: 504372
Funding Request Number: 1385794
Funding Status: Funded
Category of Service: Telecommunications Service
Form 470 Application Number: 721790000560115
SPIN: 143002704
Service Provider Name: United Utilities, Inc.
Contract Number: T
Billing Account Number: 9075434800
Service Start Date: 07/01/2006
Contract Expiration Date: 06/30/2007
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$90,271.80
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$90,271.80
Discount Percentage Approved by the USAC: 90%
Funding Commitment Decision: \$81,244.62 - FRN approved as submitted

Village Local

FCDL Date: 02/06/2007
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2007

Funding Request Number: 1385813
Funding Status: Funded
Category of Service: Telecommunications Service
Form 470 Application Number: 721790000560115
SPIN: 143022020

Non DO

Service Provider Name: United KUC, Inc,
Contract Number: T
Billing Account Number: 9075434800
Service Start Date: 07/01/2006
Contract Expiration Date: 06/30/2007
Number of Months Recurring Service Provided in Funding Year: 12
Annual Pre-discount Amount for Eligible Recurring Charges: \$34,353.36
Annual Pre-discount Amount for Eligible Non-recurring Charges: \$.00
Pre-discount Amount: \$34,353.36
Discount Percentage Approved by the USAC: 66%
Funding Commitment Decision: \$22,673.22 - FRN approved; modified by SLD
Funding Commitment Decision Explanation: The FRN was modified from \$4,082.11 to \$2,862.78 at the request of the applicant. The shared discount was reduced to a level that could be validated by third party data.

RET Local

FCDL Date: 02/06/2007
Wave Number: 042
Last Allowable Date for Delivery and Installation for Non-Recurring Services: 09/30/2007

MTW KUC

Harry



ATTACHMENT "E"

Schools and Libraries Division

Form 472 (BEAR Form) Notification Letter

September 28, 2007

United KUC, Inc,
Angela Gaylor
5450 A Street
Anchorage, AK 99518-1291

Re: Form 472 Invoice Number: 810297
Service Provider Identification Number: 143022020
Applicant Form 472 Identifier: Bet Schools 06-07
Billed Entity Number: 145563

LOWER KUSKOKWIM SCHOOL DIST
TED BERRY
P.O. BOX 305
BETHEL, AK 99559

Preferred Mode of Contact: Phone at (907) 543-4876
Total Amount of Reimbursement Approved for Payment: \$16039.06

This letter is to notify you that the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has received and accepted a Form 472 from the above named applicant listing you as the service provider. The SLD has committed to reimburse the discounted portion of the cost of eligible services provided to eligible entities pursuant to one or more Forms 471. As stated in the Form 486 Notification Letter sent to you previously, the applicant has filed a Form 486 advising the SLD that service delivery has begun. The applicant has completed this Form 472 with your assistance, seeking reimbursement of the discounted portion of bills already paid in full to you since the effective date of the discount.

The SLD has processed the Form 472. Pursuant to the Service Provider Acknowledgment page of the Form 472 which you signed, you must remit to the applicant the amount shown as "Total Amount of Reimbursement Approved for Payment" above, no later than 10 calendar days after receipt of payment of the approved discounts from USAC. You also agreed not to tender or make use of the payment of the approved discounts issued by USAC to you prior to remitting the discount to the applicant.

The USAC check should be mailed to the service provider named above within 20 calendar days of the date of this letter.

To reimburse the "Total Amount of Reimbursement Approved for Payment," to the applicant, the service provider may (1) issue a check or (2) issue a credit to the applicant. The decision as to which form the reimbursement should take should be a mutual one between the service provider and the applicant.

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EXPLANATION OF INFORMATION PROVIDED IN THIS FORM 472 (BEAR FORM) NOTIFICATION LETTER

To help understand the Form 472 Notification Letter Applicant Reimbursement Synopsis the following definitions are provided.

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Funding Year: The funding year for which discounts have been approved. Funding years begin on July 1 and end on the following June 30. Funding years are designated by the calendar year in which they begin.

Contract Number: The contract or agreement number as identified in Block 5, Item 15 of the Form 471.

Funding Commitment Decision: This represents the TOTAL amount of funding that the SLD has reserved to reimburse the cost of the discounts for this service for the specified funding year.

Reimbursement Amount for this FRN: This is the amount of reimbursement to the applicant that has been approved for this FRN on this Form 472.

Reimbursement Request Decision Explanation (SHOWN ONLY IF RELEVANT): This is the reason(s) that a Reimbursement Request was reduced or rejected.

Schools and Libraries Division
Universal Service Administrative Company
CC: LOWER KUSKOKWIM SCHOOL DIST

FORM 472 NOTIFICATION LETTER APPLICANT REIMBURSEMENT SYNOPSIS

Funding Request Number: 1385813
471 Application Number: 504372
Funding Year : 07/01/2006 - 06/30/2007
Contract Number: T
Funding Commitment Decision: \$22673.22
Reimbursement Amount for this FRN: \$16039.06
